

LAW OFFICES  
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
120 S. LaSalle  
18<sup>th</sup> Floor  
Chicago, Illinois 60603  
Phone 312/739-4200  
Fax 312/419-0379

September 23, 2014

**VIA U.S. MAIL**

The Honorable Judge William H. Pauley III  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1920  
New York, New York 10007

**Re: *Angelique Tocco v. Real Time Resolutions, Inc.*  
Case No. 14-cv-0810**

Dear Judge Pauley,

I represent plaintiff Angelique Tocco in the above matter. I am writing to oppose the request of defendant Real Time Resolutions, Inc. to certify for immediate appeal pursuant to 28 U.S.C. § 1292(b) this Court's August 13, 2014 Memorandum and Order ("August 2014 Order") or alternatively schedule a pre-motion conference.

Without addressing the merits-based arguments made by defendant, plaintiff points out that, as defendant noted, the issues raised by this Court's August 14 Order are already on appeal in the cases of *Hart v. FCI Lender Services Inc.*, 14-cv-191 (2d Cir. filed January 27, 2014) and *Franco v. Allied Interstate, LLC*, No. 14-cv-1464 (filed May 12, 2014). Oral argument on *Hart* was heard on August 27, 2014. The quickest resolution of the issues raised by defendant will come with decisions in *Hart* and *Franco*.

Respectfully Yours,

s/Tiffany N. Hardy  
Tiffany N. Hardy

Tiffany N. Hardy  
*Attorneys for Plaintiff*

EDELMAN, COMBS, LATTURNER,  
& GOODWIN, LLC  
120 South LaSalle Street, Suite 1800  
Chicago, IL 60603  
Ph: (312) 739-4200  
[thardy@edcombs.com](mailto:thardy@edcombs.com)

Abraham Kleinman  
*Attorney for Plaintiff*  
626 RexCorp Plaza  
Uniondale, NY 11556  
Ph: (516) 522-2621  
[akleinman@kleinmanllc.com](mailto:akleinman@kleinmanllc.com)

**CERTIFICATE OF SERVICE**

I, Tiffany N. Hardy, hereby certify that on September 23, 2014, I caused a true and accurate copy of the foregoing document to be filed via the Court's CM/ECF system, which will send notification of such filing to the following:

Abraham Kleinman  
[akleinman@kleinmanllc.com](mailto:akleinman@kleinmanllc.com)

Casey Devin Laffey  
[claffey@reedsmith.com](mailto:claffey@reedsmith.com)

Geoffrey Garrett Young  
[gyoung@reedsmith.com](mailto:gyoung@reedsmith.com)

s/ Tiffany N. Hardy  
Tiffany N. Hardy

EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
120 South LaSalle Street, 18<sup>th</sup> Floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)